

# Exhibit 19

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

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[1] MISTY WHITE, )  
[2] JERMAINE BRADFORD, )  
[3] JANARA MUSGRAVE, )  
[4] LONDON PROUDFIT, )  
[5] BRADLEY BARBER, JR., and )  
[6] DAKOTA KAPPUS, )

On behalf of themselves and all )  
others similarly situated, and )

[7] OKLAHOMA STATE )  
CONFERENCE, NAACP, )

Plaintiffs, )

v. )

[1] HON. PAUL HESSE, in his official )  
capacity as presiding District Court )  
Judge, )

[2] HON. JACK MCCURDY, )  
in his official capacity as District Court )  
Judge, )

[3] HON. BARBARA HATFIELD, )  
[4] HON. CHARLES GASS, )  
[5] HON. KHRISTAN STRUBHAR, in their )  
official capacities as Special District )  
Judges in the Canadian County District )  
Court, and )

[6] CANADIAN COUNTY DISTRICT )  
COURT, 26TH JUDICIAL DISTRICT, )

Defendants. )

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Case No. \_\_\_\_\_  
(Class Action)

Hon. \_\_\_\_\_

**DECLARATION OF MEGAN LAMBERT IN SUPPORT OF MOTION FOR  
CLASS CERTIFICATION**

I, Megan Lambert, hereby declare under penalty of perjury:

1. I am an attorney with the American Civil Liberties Union of Oklahoma Foundation (ACLU of Oklahoma) and have knowledge of the facts contained in this declaration. ACLU of Oklahoma is co-counsel for Plaintiffs in the above-captioned litigation, and I submit this declaration which details the qualifications of ACLU of Oklahoma attorneys in support of Plaintiffs' Motion for Class Certification.

2. The ACLU of Oklahoma is an affiliate of the American Civil Liberties Union, a national non-profit organization founded in 1920 for the purpose of protecting civil rights and civil liberties guaranteed by the United States Constitution.

3. Since its founding in 1964, the ACLU of Oklahoma has an extensive institutional history of protecting the constitutional rights of Oklahomans and has advocated for the rights of institutionalized persons, educators, students, persons who speak out against governmental abuse, women, and minorities of religious, ethnic, and racial character. The ACLU of Oklahoma has litigated civil rights cases in Oklahoma for decades and has worked toward reforming Oklahoma's pre-trial justice system for the past two years.

4. The ACLU of Oklahoma attorneys involved in representing Plaintiffs include Ryan Kiesel, Mike Redman, and myself.

5. Ryan Kiesel is the Executive Director of the ACLU of Oklahoma. He is admitted to practice in Oklahoma and has been admitted to the bar of the U.S. Court of Appeals for the Tenth Circuit, and the United States Supreme Court. Mr. Kiesel graduated from the University of Oklahoma College of Law in 2006. Mr. Kiesel served

three terms from 2004 to 2010 in the Oklahoma House of Representatives, representing District 28. Mr. Kiesel has also served as an Adjunct Professor of Law at the University of Oklahoma College of Law, teaching a seminar entitled *Politics and the Law*. Mr. Kiesel was selected as the Executive Director of the ACLU of Oklahoma in 2011 and during his tenure he has been actively involved in litigation at before state and federal courts. Prior to joining the ACLU of Oklahoma as its Director, Mr. Kiesel's worked in private practice with Whitten Burrage a law firm in Oklahoma City, where he focused on civil litigation.

6. Michael C. Redman is the Interim Legal Director of the ACLU of Oklahoma. He is admitted to practice in the State of Oklahoma, the United States Districts Courts of the Northern, Western, and Eastern Districts of Oklahoma, the Northern District of Illinois, and has been admitted to the bars of the U.S. Courts of Appeals for the Seventh and Tenth Circuits. Mr. Redman graduated from the University of Oklahoma College of Law in 1988, whereupon he served as a law clerk to the Honorable Thomas R. Brett, United States District Judge for the Northern District of Oklahoma. Following his clerkship in 1990, Mr. Redman entered private practice focusing on management representation in employment law, ERISA litigation, and commercial litigation / unfair business practices. Mr. Redman continued that practice until he became the Interim Legal Director for the ACLU of Oklahoma in October 2019. While in private practice, Mr. Redman has represented individual employers in actions brought by class plaintiffs arising under the Fair Labor Standards Act and served as co-


counsel representing defendant members of a class and sub-class in multi-district litigation involving underpayment of natural gas royalties.

7. I am a staff attorney at the ACLU of Oklahoma. I am admitted to practice in the State of Oklahoma, the United States District Courts of the Northern, Western, and Eastern Districts of Oklahoma, and have been admitted to the bar of the U.S. Court of Appeals for the Tenth Circuit. I graduated from the University of Oklahoma College of Law in 2017 and served as a Gallogly Legal Fellow for the ACLU of Oklahoma from 2017 to September of 2019. My practice consists primarily of impact civil rights litigation under the United States and Oklahoma Constitutions.

8. I have been involved in the investigation and preparation of this lawsuit, including developing facts and legal arguments, for the past two years. I am familiar with the issues, and will zealously represent the plaintiffs and the class. Achieving the requested remedy of this lawsuit and ensuring constitutional and just pre-trial procedures for the criminally accused is central to the founding purpose of the ACLU of Oklahoma. Neither I nor the ACLU of Oklahoma is receiving any reimbursement from the individual plaintiffs or class members in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9 day of December, 2019.

  
Megan E. Lambert